

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**ELANDER WOODALL, Individually and
on Behalf of All Others Similarly Situated**

Plaintiff,

v.

**EVERGREEN PACKAGING, LLC AND
PACTIV EVERGREEN, INC.,**

Defendants.

Case No. 1:23-CV-459

Honorable Steven C. Seeger

**DEFENDANTS' UNOPPOSED MOTION
FOR ENTRY OF AGREED CONFIDENTIALITY ORDER**

Defendants, Evergreen Packaging LLC and Pactiv Evergreen Inc. (“Defendants”), by and through their attorneys, Littler Mendelson, P.C., and pursuant to Federal Rule of Civil Procedure 26(c), respectfully move this Court for entry of an Agreed Confidentiality Order.¹ In support of this Unopposed Motion, Defendants states as follows:

1. Pursuant to pre-trial discovery in this case, Plaintiff and Defendants intend to request and intend to produce certain confidential information, including records containing personal identifying information, business records, and confidential commercial information. This information constitutes and contains confidential, private and sensitive information not readily available to the public.

2. The Parties have conferred, through their respective counsel, and agreed that certain documents, information, and testimony in this litigation should be kept confidential, in order to protect the privacy rights of the parties and Defendants’ legitimate business interests.

¹ The Agreed Confidentiality Order has contemporaneously been sent to Proposed_Order_Seeger@ilnd.uscourts.gov.

3. This information could result in damage to parties and nonparties if disseminated.

4. Accordingly, Defendants request that this Court enter the Agreed Confidentiality Order to safeguard this information and preserve the confidentiality of this information throughout the litigation.

5. Entry of this Order will allow for all necessary discovery to proceed but will protect all parties and nonparties from dissemination of confidential, regulated or proprietary information.

6. No parties will be prejudiced by Entry of the Agreed Confidentiality Order.

WHEREFORE, Defendants respectfully request that this Court enter the Agreed Confidentially Order.

Dated: October 28, 2024

Respectfully submitted,

EVERGREEN PACKAGING LLC and
PACTIV EVERGREEN INC.

/s/ Matthew J. Ruza

One of Their Attorneys

John A. Ybarra
Shanthi V. Gaur
Matthew J. Ruza
jybarra@littler.com
sgaur@littler.com
mruza@littler.com
LITTLER MENDELSON, P.C.
321 N. Clark Street, Suite 1100
Chicago, Illinois 60654
Tel: 312-372-5520
Fax: 312-372-7880

CERTIFICATE OF SERVICE

The undersigned, an attorney hereby certifies that on October 28, 2024, he caused a true and correct copy of the foregoing *Defendants' Unopposed Motion for Entry of Agreed Confidentiality Order* to be served via email upon the following counsel of record:

Josh Sanford, Esq.
Sean Short, Esq.
SANFORD LAW FIRM, PLLC
10800 Financial Centre Pkwy, Suite 510
Little Rock, AR 72211
josh@sanfordlawfirm.com
sean@sanfordlawfirm.com

/s/ Matthew J. Ruza